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November 20, 2018

**Via: ECF**

Clerk, United States District Court  
District of New Jersey - Camden Vicinage  
Mitchell H. Cohen U.S. Courthouse  
1 John F. Gerry Plaza  
4th & Cooper Streets  
Camden, NJ 08101

**Re: Dawn Buongiovanni and Angel Buongiovanni v. Horizon Blue Cross Blue Shield of  
New Jersey, Dynasil Corporation of America and Evicore Healthcare  
Case No.: 1:18-cv-11641-NLH-AMD  
Our File No.: 20016-02725 GJK**

Dear Sir/Madam:

Please accept this letter on behalf of defendant, Dynasil Corporation of America, respectfully requesting an adjournment of the November 27, 2018, Scheduling Conference before Magistrate Judge Ann Marie Donio as I have a prescheduled medical appointment out of state on November 27, 2018. Additionally, the Associate working on this file with me is in the process of being admitted to the United States District Court - District of New Jersey.

Counsel for Horizon Blue Cross Blue Shield of New Jersey has consented to the adjournment of the November 27, 2018, Scheduling Conference. Rather than consenting to the adjournment, Plaintiff's counsel requested that my Associate ask the Court's permission to appear *pro hac vice* at the Scheduling Conference.

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Dawn Buongiovanni and Angel Buongiovanni v. Horizon Blue Cross Blue

Docket No.: Case No.: 1:18-cv-11641-NLH-AMD

Our File No.: 20016-02725 JXD

It should be noted that plaintiff's counsel filed the Joint Discovery Plan shortly after we requested consent for adjournment without informing defendants of same or obtaining consent of any defense counsel. Plaintiff's counsel also expressed in his cover letter: "Counsel for Horizon has not yet provided input." Counsel for Horizon provided, via email correspondence, that there were additions which were awaiting client approval and that Horizon does not consent to the form of the Joint Discovery Plan that plaintiff filed.

Therefore, because of the inability of counsel to appear along with the need of counsel to prepare an agreed-upon Joint Discovery Plan, we are respectfully requesting the Court adjourn the Scheduling Conference.

Very truly yours,

A handwritten signature in black ink, appearing to read "George Karousatos", written in a cursive style.

George Karousatos, Esq.

[g.karousatos@bdlawfirm.com](mailto:g.karousatos@bdlawfirm.com)

GJK/jxd

cc: Michael Coco, Esq., (via ECF)

Kristen Coleman, Esq., (via ECF)

Magistrate Judge Ann Marie Donio (courtesy copy via fax)